

JORGE L. SANCHEZ, ESQ,
Nevada Bar No. 10434
SANCHEZ LAW GROUP, LTD.
930 South Fourth Street, Suite 211
Las Vegas, Nevada 89101
Phone (702) 635-8529
Attorneys for Debtors,

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re:)	CHAPTER 13
Rigoberto Perez)	CASE NO: 09-14888-LBR
Debtors.)	DATE: June 18, 2009
)	TIME: 3:30 p.m.
)	
)	
)	
)	

**NOTICE OF MOTION TO VALUE DEBTORS' NON-PRINCIPAL RESIDENCE REAL
PROPERTY, AVOID WHOLLY UNSECURED LIEN(S) ENCUMBERING SAME, AND
TO MODIFY THE RIGHTS OF PARTIALLY SECURED LIENHOLDERS AND
OBJECTION TO LIENHOLDERS' PROOF(S) OF CLAIM, IF ANY**

TO: ALL INTERESTED PARTIES

NOTICE IS HEREBY GIVEN that a Motion to Value Debtors' Non-principal Residence Real Property, Avoid Wholly Unsecured Lien(s) Encumbering Same, and to Modify the Rights of Partially Secured Lienholders and Objection to Lienholders' Proof(s) of Claim, If Any, was filed on May 19, 2009, by Sanchez Law Group Ltd., Attorney for Debtor, Rigoberto Perez.

1 NOTICE IF FURTHER GIVEN that any and all opposition must be filed pursuant to Local
2 Rule 9014(d)(1), which provides in pertinent part as follows:

3 Any Opposition must be filed pursuant to Local Rule 9014(d):

4 "(1) Oppositions to a motion must be filed and service must be completed on the movant no later
5 than 15 days after the motion is served except as provided by LR 3007(b) and LR 9006. If the
6 hearing has been set on less than 15 days' notice, the opposition must be filed no later than 5
7 business days before the hearing, unless the court orders otherwise. The opposition must set forth
8 all relevant facts and any relevant legal authority. An opposition must be supported by affidavits or
9 declarations that conform to the provisions of subsection (c) of this rule.

10 (2) Except as provided by LR 3007(b), LR 7056(c), and LR 9006, any reply memorandum may be
11 filed and served by the court and the opposing party no later than 5 business days before the date set
12 for hearing or within the time otherwise fixed by the court.

13 (3) Uncontroverted facts may be taken as true. If no response or opposition is filed within the time
14 required by these rules, the matter will be deemed unopposed, the court may enter an order granting
15 the relief requested in the motion without further notice and without a hearing, and no appearance
16 need be made. At the time originally set for hearing unopposed matters, the court may on its own
17 or at the request of any party in interest continue the matter for hearing, in which case an appearance
18 on behalf of the movant will be required at the continued hearing."

19 If you object to the relief requested, you **must** file a **WRITTEN** response to this
20 pleading with the court. You must also serve your written response on the person who sent
21 you this notice.

22 If you do not file a written response with the court, or if you do not serve your written
23 response on the person who sent you this notice, then:

- 24 • The court may **refuse to allow you to speak** at the scheduled hearing; and
- 25 • The court may **rule against you** without formally calling the matter at the hearing.

26 NOTICE IS FURTHER GIVEN that the hearing on the said Motion will be held before a
27 United States Bankruptcy Judge, in the Foley Federal Building, 300 Las Vegas Boulevard South,
28 Bankruptcy Court Room 1, Third Floor, Las Vegas, NV on June 18, 2009 at 3:30 p.m.

Dated this 19th day of May, 2009.

/s/Jorge L. Sanchez, Esq.

JORGE L. SANCHEZ, ESQ.
Attorney for Debtor